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**Hearing Date: May 7, 2020**  
**Time: 10:00 a.m.**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

AL YEGA LLC,

Case No. 20-10383-shl

Debtor.

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**CERTILMAN BALIN ADLER & HYMAN, LLP'S STATEMENT IN SUPPORT OF  
DEBTOR'S OBJECTION AND SUPPLEMENTAL OBJECTION OF AL YEGA, LLC TO  
MOTION OF AJM CAPITAL II, LLC FOR (I) DISMISSAL OF THE CHAPTER 11  
CASE, OR (II) IN THE ALTERNATIVE, FOR RELIEF FROM THE AUTOMATIC  
STAY AND CROSS-MOTION TO COMPEL DISCOVERY**

**CERTILMAN BALIN ADLER & HYMAN, LLP** ("Certilman"), for its statement in support of Debtor's Objection and Supplemental Objection of Al Yega, LLC to Motion of AJM Capital II, LLC for (i) Dismissal of the Chapter 11 Case, or (ii) in the Alternative, for Relief from the Automatic Stay and Cross-Motion to Compel Discovery (Dkt. No. 39)("Objection"), respectfully states as follows:

1. On February 10, 2020 (the "Filing Date") Al Yega LLC (the "Debtor") filed a voluntary Chapter 11 under the Bankruptcy Code.
2. As reflected in the Debtor's schedules, Certilman is an unsecured creditor of the Debtor and is owed the sum of \$32,573.52 as of the Filing Date.
3. Certilman adopts and incorporates here in support of the Objection filed by the Debtor, by and through its counsel, Spence Law Office, P.C.

4. For all the reasons stated in the Objection, the Motion to Dismiss filed by AJM Capital II, LLC should be denied. Certilman, as an unsecured creditor of the Debtor's estate, believes that it would be in the best interest to the Debtor's creditors for the sales process to proceed in the pending Chapter 11 case under the jurisdiction of the United States Bankruptcy Court.

**WHEREFORE**, Certilman Balin Adler & Hyman, LLP respectfully requests that this Court deny the Motion to Dismiss filed by AJM Capital II, LLC; and (ii) and for such other, further and different relief as this Court deems just, proper and equitable.

Dated: East Meadow, New York  
April 28, 2020

**CERTILMAN BALIN ADLER & HYMAN, LLP**

By: /s/ Richard J. McCord  
**RICHARD J. MCCORD, ESQ.**  
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